

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

HEATHER GAUTHIER,)	
Plaintiff,)	
)	
v.)	C.A. No. 05-10136-RWZ
)	
RICKY SANTIAGO and CITY OF)	
LAWRENCE)	
Defendants.)	

**JOINT (AND ASSENTED-TO) MOTION TO EXTEND
TIME FOR DISCOVERY**

Defendants, Ricky Santiago and the City of Lawrence, with the assent of the Plaintiff, hereby move the Court for a modification of the discovery order allowing for the depositions of the Plaintiff and Plaintiff's employer by Friday November 18, 2005, extending the time until November 30, 2005 to inform the Court whether the parties wish to seek mediation, arbitration or settlement in this matter, and extending the deadline for the completion of discovery until March 3, 2006. The basis for this Motion is as follows:

1. The Court's scheduling order called for the completion of the depositions of the Plaintiff and Plaintiff's employer by August 8, 2005.
2. Due to attorneys' schedules, and the departure of Defendant's attorney from the law firm following the scheduling conference, the Defendants were not able to complete the Plaintiff's and the Plaintiff's employer's deposition by August 8, 2005, and do not anticipate being able to complete these depositions until on or about November 18, 2005.
3. Counsel for Defendant, Ricky Santiago, spoke with the attorneys for the other parties and informed them of the intent to file this Motion, and provided them with a copy of the Motion to review.
4. Plaintiff's counsel assented to this Motion.

5. This Motion is made in good faith and not for the purpose of obstruction or delay.

WHEREFORE, the Defendants, Ricky Santiago and City of Lawrence, by their attorneys and with the consent of counsel for the Plaintiff, Heather Gauthier, respectfully request an extension to complete the deposition of the Plaintiff and the Plaintiff's employer by Friday, November 18, 2005, an extension until November 30, 2005 to inform the Court if they wish to seek mediation or settlement of this suit, and an extension until March 3, 2006 to complete discovery.

Respectfully submitted,

For the Defendants,
Ricky Santiago,
By its attorney,

For the Defendant,
CITY OF LAWRENCE
by its attorney

/s/ Kathleen A. Pennini
Matthew E. Dwyer (BBO# 139840)
Kathleen A. Pennini (BBO# 654573)
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/s/ James Bowers
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Assistant City Solicitor
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Assented to ,
For the Plaintiff,
Heather Gauthier,
By her attorney,

/s/ Marc D. Padellaro
Marc D. Padellaro
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